



Privacy Policy

Document reference: *Privacy2609a*

1. Introduction

Welcome to consciousgrowth.eu. We are committed to protecting your privacy and ensuring that your personal information is handled in a safe and responsible manner. This Privacy Policy outlines how we collect, use, and protect your personal data when you visit our website and use our services, including our legal psychedelic retreats in the Netherlands.

Michael Conti and Joan Manuel Giménez Sanchíz are the data controllers responsible for the personal data processed through this website and our retreat services.

2. Information We Collect

Personal Data: We may collect and process the following personal information that you voluntarily provide to us, all of which are required for retreat participation:

- Name
- Date of Birth
- Email address
- Phone number
- Address
- Gender
- Profession
- Payment information
- Medical and mental health history
- Emergency contact information
- Any other information you provide during registration or consultation

Non-Personal Data: We may automatically collect non-personal information when you visit our website, including:

- Pages viewed and the dates/times of access
- IP address
- Browser type
- Operating system
- Referring URLs

3. How We Use Your Information

We use the information we collect for the following purposes:

- To send you newsletters and promotions as long as you opted to receive them
- To provide and manage our services, including retreat bookings and consultations
- To process payments and manage billing
- To communicate with you regarding your inquiries, bookings and our services

- To assess your suitability for participation in our retreats, including reviewing medical history
- To ensure participant safety and comply with health and legal requirements
- To improve our website and services
- To comply with legal obligations and protect our legal rights

4. Legal Bases for Processing Personal Data

We process personal data under the following legal bases:

- **Application Form:** Processed under Article 6(1)(b) GDPR as necessary to evaluate and process your request prior to entering into a retreat agreement.
- **Registration Form 1 and Retreat Agreements:** Processed under Article 6(1)(b) GDPR (to perform the retreat agreement) and Article 6(1)(f) GDPR (for the establishment, exercise, or defence of legal claims and business administration).
- **Medical Screening / Intake Questionnaire and Registration Form 2:** Health-related information is special category data under Article 9 GDPR. We process this data based on your explicit consent pursuant to Article 9(2)(a) GDPR, in conjunction with:
 - Article 6(1)(b) GDPR (to assess suitability and safely fulfil our contractual obligations before and during the retreat), and
 - Article 6(1)(f) GDPR (our legitimate interest in maintaining participant safety and defending against legal or insurance claims).

Note: Explicit consent is required for participation. Consent cannot be withdrawn retroactively for data already processed for safety or legal purposes.

- **Preparation Questionnaire:** Processed under Article 6(1)(b) GDPR as necessary for pre-retreat preparation activities. These questionnaires contain only the participant's name and personal reflections, with no sensitive, contractual, or safety-relevant data.
- **Marketing Communications:** Processed under Article 6(1)(a) GDPR on the basis of consent, which can be withdrawn at any time.
- **Research Consent and Research Data:** Processed on the basis specified in the relevant research documentation.

5. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including to comply with legal, financial, or contractual obligations, or to establish, exercise, or defend legal claims:

- **Application Form:** Until the retreat date (basic information only; no sensitive data).
- **Registration Form 1** (practical information only): retained for the same period as the Retreat Agreement and Intake Questionnaire it accompanies.
- **Registration Form 2** (returning participants, contains some medical data, used only where the participant returns within 1 year of their last intake): 7 years from the retreat date (or, where applicable, from the participant's most recent retreat). Access to health data during this period is strictly restricted to authorised personnel on a need-to-know basis.
- **Retreat Agreement** (incorporating Participation Agreement and Informed Consent, Terms & Conditions and Data Protection Notice): 7 years from the retreat date
- **Intake Questionnaires with health screening:** 7 years from the retreat date (or, where applicable, from the participant's most recent retreat). Access to health data during this period is strictly restricted to authorised personnel on a need-to-know basis.
- **Preparation Questionnaire:** deleted immediately after the retreat date
- **Marketing/newsletter consent:** Until withdrawn or no longer necessary for the relevant purpose
- **Research Consent:** 10 years from date of signing, where necessary to document the basis on which research data was collected
- **Anonymised research data:** Potentially indefinitely, provided the data has been genuinely anonymised and can no longer reasonably be linked to an identifiable individual.

Justification for the 7-year retention period

The 7-year retention period for participant, contractual and health-screening records reflects the nature of our retreats and the need to maintain appropriate records for contractual, financial, insurance, health and safety, regulatory and legal purposes. In particular, records may be necessary to establish the circumstances of a participant's attendance, the information available to us at the time of screening, the terms agreed with the participant, and to establish, exercise or defend legal claims that may arise after the retreat.

The 7-year period also aligns with the Dutch tax administration's general requirement to retain business administration records for seven years. This does not mean that Dutch law requires all personal or health data to be retained for seven years; rather, we consider the period necessary and proportionate for the categories of participant information described above, taking into account our contractual and legal obligations, insurance requirements and the potential need to establish, exercise or defend legal claims.

Where a legal, insurance or regulatory matter is active or reasonably anticipated, relevant records may be retained beyond the standard retention period for as long as necessary to resolve that matter.

6. How We Share Your Information

We do not sell or rent your personal information to third parties. We may share your information with third parties in the following circumstances:

- To protect the rights, property, or safety of consciousgrowth.eu, our clients, or others
- With service providers and partners who assist us in delivering our services (e.g., payment processors, healthcare professionals)
- When required by law or in response to legal requests

7. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss or misuse. However, no system is completely secure, and we cannot guarantee the absolute security of your information.

8. Your Rights

You have the following rights regarding your personal data:

- **Access:** You can request a copy of the personal data we hold about you.
- **Rectification:** You can request that we correct any inaccuracies in your personal data.
- **Deletion:** You can request that we delete your personal data, subject to certain legal restrictions.
- **Objection:** You can object to the processing of your personal data for direct marketing purposes.
- **Restriction:** You can request that we restrict the processing of your personal data under certain circumstances.
- **Withdrawal of Consent:** Where our processing is based on your consent, including health data provided under Article 9(2)(a) GDPR, you can withdraw that consent at any time. This does not affect the lawfulness of processing carried out before withdrawal, or processing carried out for other purposes.
- **Complaint:** You have the right to lodge a complaint with a supervisory authority, such as the Spanish Agencia Española de Protección de Datos (AEPD) or the Dutch Autoriteit Persoonsgegevens (AP), if you believe your data protection rights have been infringed.
- **Data Portability:** You can request that we transfer your personal data to another organisation, where technically feasible.

To exercise these rights, please contact us using the contact details provided on our website.

9. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance your experience on our website. Cookies are small data files stored on your device. You can control the use of cookies through your browser settings.

10. International Data Transfers

If we transfer your personal data outside the European Economic Area (EEA), we will ensure that appropriate safeguards are in place, such as standard contractual clauses approved by the European Commission, to protect your data.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any significant changes by posting the new policy on our website and updating the effective date. Your continued use of our services after the changes take effect constitutes your acceptance of the revised policy.

12. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us using the details provided on our website consciousgrowth.eu or our email: contact@consciousgrowth.eu.